15-197

marine instruments

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June 26, 2015

ACCEPTED/FILED

AUG 18 2015

Federal Communications Commission
Office of the Secretary

Federal Communications Commission
1270 Fairfield Rd
Gettysburg, PA 17325-7245
Attn: WTB-TSI Daniel McCleary

RE: Request for Waiver to CFR 47 Part §80.373(c):
Device Model M2P/M3P/MBP GPS HF Radio Buoy for Commerial Fishing Operations

This correspondence is to request a waiver of the technical requirements governing private communications in FCC Rules Part §80.373(c) related to commercial fishing operations and "associated ship units".

§80.373 PRIVATE COMMUNICATIONS FREQUENCIES.

(c) *Frequencies in the 2000-27500 kHz bands for business and operational communications.* (1) The following simplex frequencies in the 2000-27500 kHz band are available for assignment to private coast stations for business and operational radiotelephone communications. These simplex frequencies also are available for use by authorized ship stations for business and operational radiotelephone communications.

Business and Operational Frequencies in the 2000-27500 kHz Band; Carrier Frequencies (kHz)

2065.0[13]	4146	6224	8294	12353	16528	18840	22159	25115
2079.0[13]	4149	6227	8297	12356	16531	18843	22162	25118
2096.5[1]	4125[2]	6230		12359[6]	16534		22165	
3023.0[4]	4417[5]	6516					22168	
	5680[4]						22171	

The device is an HF radio GPS buoy which is used to tag the location of gear used in high seas fishing operations. The buoys are attached to the fishing gear in order to facilitate safe and efficient recovery, to prevent gear loss, navigational risk, and ghost fishing.

Waiver Request

The technical provisions that we are requesting are as follows (operating under the frequency allocation and emission provisions of Part §80.373(c)

1. Frequency of Operation: 26.145 to 26.175 MHz in seven channels.
2. Emission Class: J3D

Requested Channels

Channel	Freq. TX (MHz)
1	26.145
2	26.150
3	26.155
4	26.160
5	26.165
6	26.170
7	26.175

www.marineinstruments.es | T/ +34 986 366360 | @/ ghamann@marineinstruments.es | Rúa dos Padróns nº4, 36350 Nigrán España

Brochures describing the device are attached. These buoys form part of the fishing gear and daily fishing operations. They are CE approved for European vessels in the requested frequencies, and are typically operated in offshore lcoations over 15 miles from the coast, in the Economic Exclusive Zone (EEZ), and in international waters by longliners and other vessels. The daily fishing operations provide ample opportunity to recharge the batteries which have a nominal duration of 8 days. The buoy uses audio tones and transmits encrypted GPS location, battery status, and sea surface temperature. Transmissions are 6 Watts, and 3.9 seconds in duration every 5, 10 or 15 minutes (configurable). Data are received by the standard SSB HF radio located on the vessel.

Benefits of this system include:

- Faster and safer recovery of fishing equipment,
- Faster recovery of the catch enhances quality and reduce mortality of bycatch,
- Reduction of fuel and the carbon footprint of the vessels,
- Reduction of lost fishing gear preventing 'ghost' fishing posing a threat to wildlife.
- Reduction of lost fishing gear that otherwise could cause hazards to navigation.

Please contact the undersigned if you have any questions,

Sincerely,

Gregory Hammann
Director Strategic Business Development
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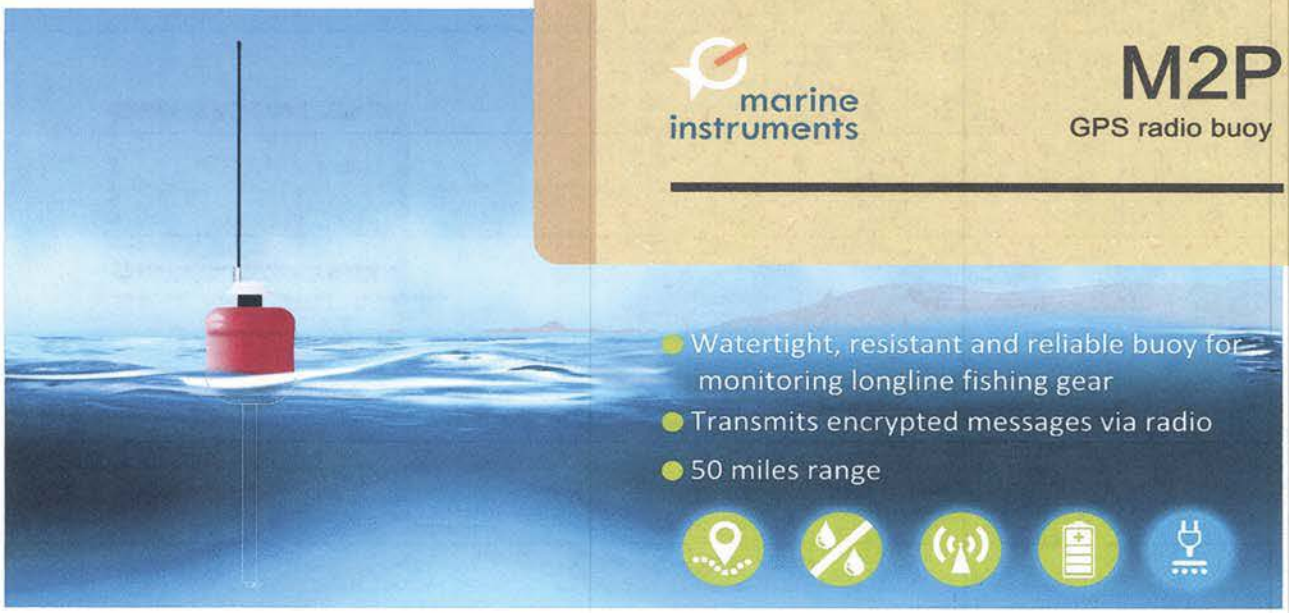

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M2P

GPS radio buoy

- Watertight, resistant and reliable buoy for monitoring longline fishing gear
- Transmits encrypted messages via radio
- 50 miles range

- The buoy reports data on:
  - Position and **GPS** tracking
  - **Battery** level
  - **Temperature** (optional)
- New **lid with epoxy**: watertight and resistant to pressure.
- Waterproof up to **100 meters** depth.
- **Encrypted messages** to increase security.
- Transmissions every **5, 10 or 15 minutes.** User- configurable.
- **No** communications cost.
- **Flash** for location.
- Battery with up to **8 days autonomy**.
- **New individual intelligent charger** with indicators of charge included with each buoy.
- **Proprietary software,** MSB Palangre (for surface longline) and MSB Cacea (for bottom longline) free with each buoy.

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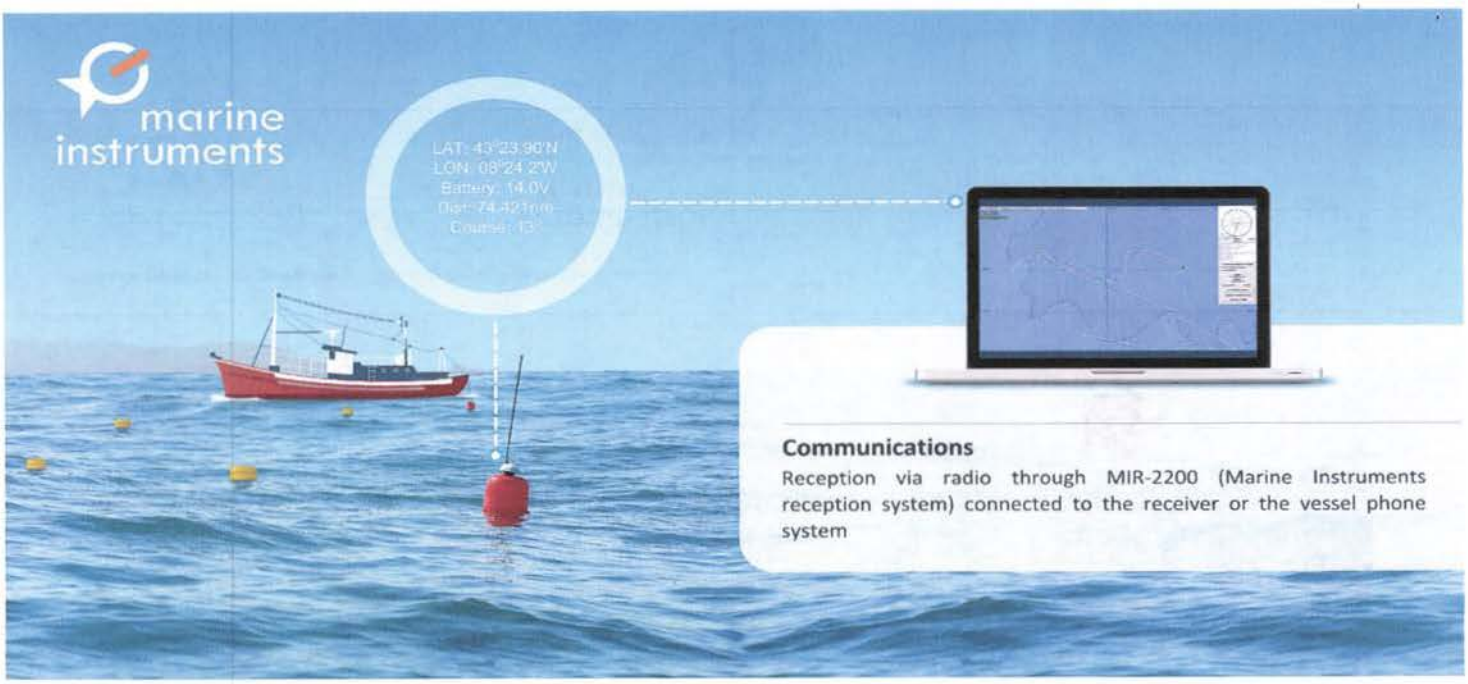

Communications

Reception via radio through MIR-2200 (Marine Instruments reception system) connected to the receiver or the vessel phone system

Technical features

Frequency of transmission
26 MHz

Battery
Rechargeable through the antenna

Weight
Buoy: 2,6 Kg **Tube:** 3,5Kg.

Working temperature
0ºC a + 50ºC

Depth
100 m.

Range
50 miles

Dimensions

Accesory

MIP-C
Multiple charger

- Allows the **independent and simultaneous charge** of four M2P buoys.
- Approximate charging time: **9 hours.**
- **Individual LEDs** to indicate the charging status of each buoy.
- **Battery maintenance current** to avoid battery discharge.
- **Stainless steel** high quality stand.

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MBP

GPS radio buoy

- Radio buoy for monitoring longline fishing gear
- Long-lasting battery
- Water temperature measurement

- The buoy reports data on:
  - Position and **GPS** tracking
  - **Battery** level
  - **Temperature**
- Transmissions via radio every **5, 10 or 15 minutes.** User-configurable.
- **No communications cost.**
- **Encrypted messages** to increase security.
- Long lasting battery: Up to **3 weeks of autonomy** with transmissions every 10 minutes.
- Up to **50 miles** range.
- Great resitance and durability. **Protection rubber** to avoid impacts and breakage.
- **Easy storage** on board. Does not need float or tube.

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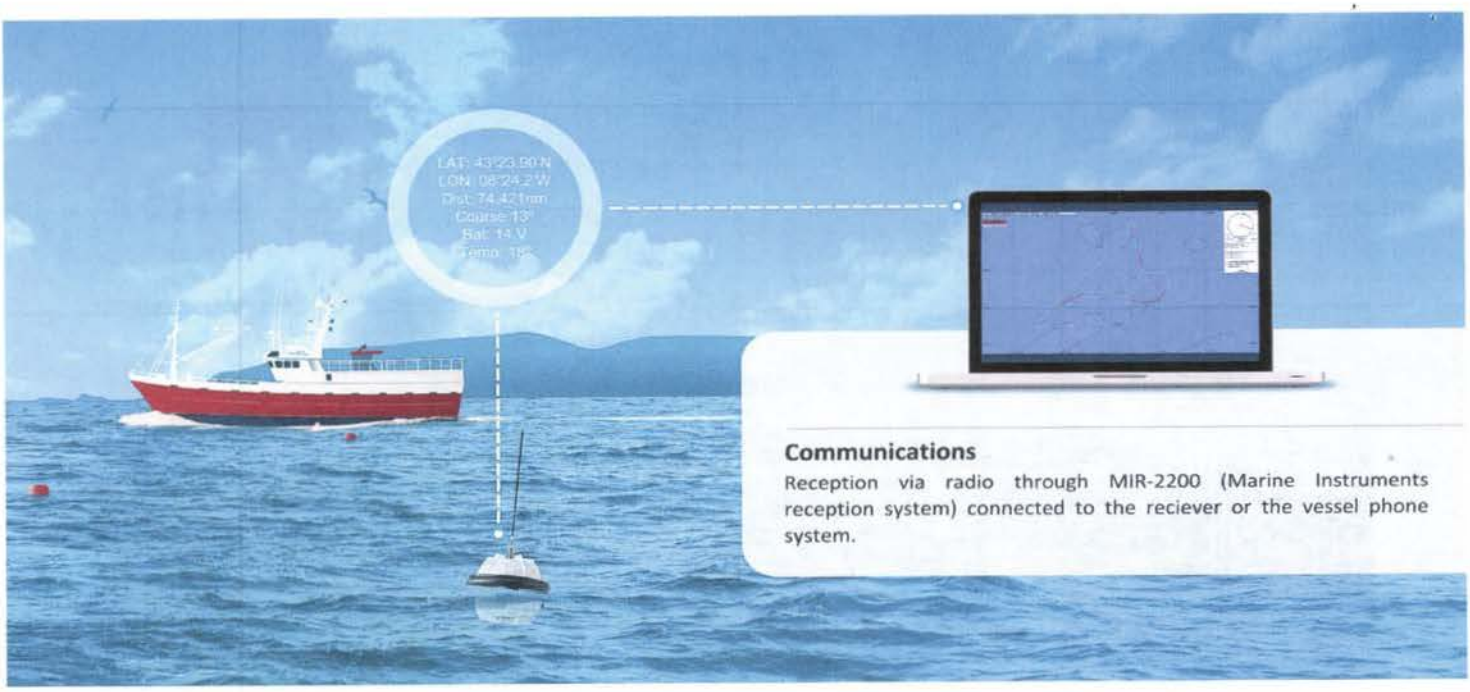


Communications

Reception via radio through MIR-2200 (Marine Instruments reception system) connected to the reciever or the vessel phone system.

Technical features

Frecuency of transmission
26 MHz

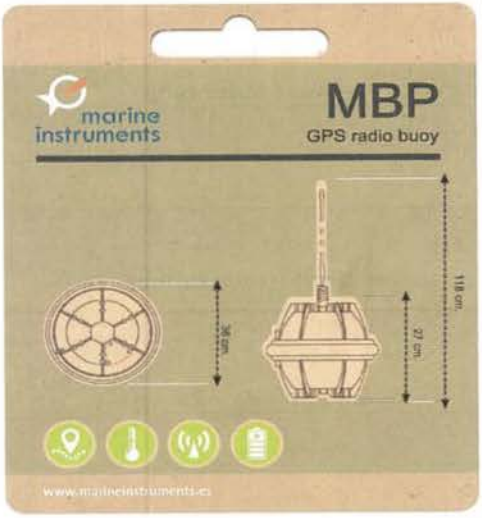
Battery
Rechargable through the antenna.

Weight
6,2 Kg.

Working temperature
0°C a + 50°C

Range
50 miles

Dimensions



- **Individual intelligent charger** with battery level indicator included with each buoy.
- **Flash** for night/day location.
- **Configurable** through the buoy's antenna.
- Approximate charging time: **9 hours.**
- **Propietary software (MSB Palangre) free** with every buoy.
- The MSB Palangre helps to improve efficency on board with its **automatic tracking of the longline.**
- The software shows the positions of the buoys, the route of the vessel and the estimated time of arrival to the buoys in **C-MAP charts.**

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